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United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JOEY DONALD STEWART CAMPBELL,
15 Defendant.
16

CASE NO. 2:21-cr-0206 TLN
18 U.S.C. § 2252(a)(2) – Distribution of Child
Pornography; 18 U.S.C. § 2252(a)(2) – Receipt of
Child Pornography; 18 U.S.C. § 2252(a)(4)(B) –
Possession of Child Pornography; 18 U.S.C. §
2253(a) – Criminal Forfeiture

17 I N D I C T M E N T

18 COUNT ONE: [18 U.S.C. § 2252(a)(2) - Distribution of Child Pornography]

19 The Grand Jury charges: T H A T

20 JOEY DONALD STEWART CAMPBELL,
21 defendant herein, beginning on or about March 22, 2020, and continuing through on or about March 26,
22 2020, in the County of Sacramento, State and Eastern District of California, did knowingly and
23 intentionally distribute visual depictions, including, but not limited to:

- 24 • 1242955788152270852-ZgrbufALf_Flo5TLBk1nJb6T68q4vctiniX-8D3gd44
25 • 1242633565533163526-IVZTQpv9
26 • 1242632195736342532-YOqCOVdu

27 using a means and facility of interstate commerce and which was mailed, shipped, and transported in
28 and affecting interstate commerce, by any means including by computer, where the production of such

visual depictions involved the use of a minor engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), and such visual depiction is of such conduct, all in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT TWO: [18 U.S.C. § 2252(a)(2) - Receipt of Child Pornography]

The Grand Jury further charges: T H A T

JOEY DONALD STEWART CAMPBELL,
defendant herein, beginning on or about July 10, 2020, and continuing through on or about November 15, 2020, in the County of Sacramento, State and Eastern District of California, did knowingly receive visual depictions, including, but not limited to:

- 1.mp4
- JS露出見せ Brave Asian Repaired - .mp4
- Short vid but cute.mp4
- 1_4951728461971456106.mp4

using a means and facility of interstate or foreign commerce and that was mailed, shipped, and transported in and affecting interstate commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), and such visual depiction is of such conduct, all in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT THREE: [18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography]

The Grand Jury further charges: T H A T

JOEY DONALD STEWART CAMPBELL,
defendant herein, beginning on or about March 22, 2020, and continuing through on or about December 18, 2020, in the County of Sacramento, State and Eastern District of California, and elsewhere, did knowingly possess at least one matter, to wit:

- 1.mp4
- JS露出見せ Brave Asian Repaired - .mp4
- Short vid but cute.mp4
- 1_4951728461971456106.mp4

1 which contained visual depictions that had been shipped and transported using a means and facility of
2 interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which were
3 produced using materials using materials that had been so shipped and transported, by any means
4 including by computer, where the production of such visual depictions involved the use of a minor
5 engaged in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), and
6 such visual depictions were of such conduct, all in violation of Title 18, United States Code, Section
7 2252(a)(4)(B) and (b)(2).

8 FORFEITURE ALLEGATION: [18 U.S.C. § 2253(a) - Criminal Forfeiture]

9 1. Upon conviction of one or more of the offenses alleged in Counts One through Three of
10 this Indictment, defendant JOEY DONALD STEWART CAMPBELL, shall forfeit to the United States
11 pursuant to Title 18, United States Code, Section 2253(a), any and all matter which contains visual
12 depictions produced, transported, mailed, shipped or received in violation thereof; any property, real or
13 personal, constituting or traceable to gross profits or other proceeds the defendant obtained as a result of
14 said violations; and any property, real or personal, used or intended to be used to commit and to promote
15 the commission of such violations, or any property traceable to such property, including but not limited
16 to the following:

- 17 a. Galaxy Note 10+ SM-N975U, IMEI: 359271104267293;
- 18 b. a Samsung Galaxy S6 SM-G920AZ, IMEI:359702060781109;
- 19 c. a Galaxy Ace 4 Lite SM-G13ML, IMEI: 354073063495922;
- 20 d. a Samsung SGH-T404G, IMEI: 353139045655230; and
- 21 e. a MacBook Pro, Model A2141.

22 2. If any property subject to forfeiture as a result of the offenses alleged in Counts One
23 through Three of this Indictment, for which defendant is convicted:

- 24 a. cannot be located upon the exercise of due diligence;
- 25 b. has been transferred or sold to, or deposited with, a third party;
- 26 c. has been placed beyond the jurisdiction of the Court;
- 27 d. has been substantially diminished in value; or

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e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United State Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant, up to the value of the property subject to forfeiture.

A TRUE BILL.

/s/ Signature on file w/AUSA

FOREPERSON



PHILLIP A. TALBERT
Acting United States Attorney

No. _____

2:21-cr-0206 TLN

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JOEY DONALD STEWART CAMPBELL

No Bail Warrant Pending Hearing

I N D I C T M E N T

VIOLATION(S):

18 U.S.C. § 2252(a)(2) – Distribution of Child Pornography;
18 U.S.C. § 2252(a)(2) – Receipt of Child Pornography;
18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography;
18 U.S.C. § 2253(a) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 21st day

of October, A.D. 20 21

/s/ J. Streeter

Clerk.

No Bail Warrant Pending Hearing

Carol H. Delaney

2:21-cr-0206 TLN

United States v. Joey Donald Stewart Campbell

Penalties for Indictment

DEFENDANT:

JOEY DONALD STEWART CAMPBELL

COUNT 1 and 2: JOEY DONALD STEWART CAMPBELL

VIOLATION: 18 U.S.C. § 2252(a)(2) – Distribution or Receipt of Child Pornography

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 20
years in prison; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count); \$5,000 JVTA / §3014 (mandatory if the defendant is not found to be indigent); Special assessment, pursuant to 18 U.S.C. § 2259A of no more than \$35,000 if the defendant is not found to be indigent.

COUNT 3: JOEY DONALD STEWART CAMPBELL

VIOLATION: 18 U.S.C. § 2252(a)(4)(B) - Possession of Child Pornography

PENALTIES: Maximum of up to 10 years in prison; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count); \$5,000 JVTA / § 3014 (mandatory if the defendant is not found to be indigent); Special assessment, pursuant to 18 U.S.C. § 2259A of no more than \$17,000 if the defendant is not found to be indigent.

FORFEITURE ALLEGATION: JOEY DONALD STEWART CAMPBELL

VIOLATION: 18 U.S.C. § 2253(a) – Criminal Forfeiture

PENALTIES: As stated in the charging document